

Maria P. Herrero
Valent BioSciences Corporation
870 Technology Way
Libertyville, IL 60048

Subject: N,6-Benzyladenine
EPA Experimental Use Permit No. 73049-EUP-E
Your Correspondence of November 9, 2001

Dear Ms. Herrero:

Your February 7, 2002 (PR Notice 86-5 compliance date), Experimental Use Permit (EUP) proposed label has been reviewed by the Biopesticides and Pollution Prevention Division (BPPD). The label was found to be deficient and the review results are presented below.

- 1) In accordance with section I.A. of Pesticide Registration Notice (PRN) 2001-1, a referral statement is required whenever page one of the label does not include first aid statements. Therefore, directly below the signal word, add to page one a referral statement such as, "See Side/Back panel for additional precautionary statements."
- 2) The label requires revision to alphabetically include the five new states added during the Section G revisions of March 26, 2002 and October 9, 2002 (EPA e-mail receipt date): Idaho, Maine, Maryland, Vermont and Utah.
- 3) Because Toxicity Category IV was assigned to the acute inhalation study (MRID 455936-04, see our letter of October 24, 2002 and its enclosed R. Gardner to D. Greenway memorandum of June 14, 2002), it is not required that the inhalation exposure route be addressed in the First Aid section. Remove the inhalation text, or relocate it to appear beneath the required ocular exposure First Aid text, at your option.

4) Correct the typographical error in word four (“contact”) in the second sentence under “Hot Line Number.”

5) Because Toxicity Category IV was assigned to the acute inhalation study (MRID 455936-04, see our letter of October 24, 2002 and its enclosed R. Gardner to D. Greenway memorandum of June 14, 2002), it is not required that the inhalation exposure route be addressed in the Precautionary Statements section. If you opt not to include the inhalation exposure route in the First Aid section, the inhalation text must also be deleted from this section, and the text revised to read, “Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.” Should you opt to retain (and relocate) the inhalation exposure route text in the First Aid section, revise this section to read, “Causes moderate eye irritation. Harmful if inhaled. Avoid contact with eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.”

6) Delete entries three and four (waterproof gloves and protective eyewear) from the list of Personal Protective Equipment to be worn by applicators and other handlers.

7) From the User Safety Recommendations box, remove the third entry (“Remove PPE immediately...”).

8) From the Agricultural Use Requirements box, remove the fourth entry (“Protective eyewear”) from the list of early entry Personal Protective Equipment.

9) Under the General subheading in the Application Instructions section, in “bullet” three, change “products” to “product,” or insert the product name, or instead explain why “products” is the appropriate term.

10) In the Additional Instructions sections for both apple uses, insert the temperature degree symbol (°) between “65” and “F.”

11) Revise the label (Section B of Pesticide Petition 2G6378) or Pesticide Petition 2G6378 Section G to reconcile the maximum product application rate for both apples and pistachios (the proposed label gives 308 fluid ounces versus 325 fluid ounces in Section G for apples, and 50 fluid ounces versus 52 fluid ounces in Section G for pistachios). We note that calculations based on the label (Section B) statement that “VBC 30001 contains 75 g ai/128 fl oz” align with the maximum product application rate values of the proposed label, rather than Section G.

12) A pre-harvest interval (PHI) for both apples and pistachios must be added to the label. The label PHIs must be consistent with the submitted field trials for each crop.

13) Because the product label may not direct the user to apply a quantity of product greater than that contained by the product container, the “VBC 30001Dilution Table” requires revision to omit the entries exceeding the stated 1-gallon (128 fluid ounces) container capacity.

To expedite the review of any label revised in accordance with this letter, I invite you to fax ((703) 305-0118) the updated label to Denise Greenway’s attention. Should you have questions or concerns regarding this letter, please contact me, or telephone Ms. Greenway on (703) 308-8263.

Sincerely,

Sheryl Reilly, Ph.D.
Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511C)

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